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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
_____)	

**DEBTORS' STATEMENT SETTING FORTH THE RESOLUTION OF THE RESPONSE
TO DEBTORS' THIRD OMNIBUS OBJECTION TO CLAIMS
(AMENDED AND SUPERSEDED CLAIMS) FILED BY REBECCA KELLER**

Debtor Residential Capital, LLC and its affiliated debtors in these chapter 11 cases (collectively, the "Debtors") respectfully submit this statement (the "Statement") setting forth the resolution of the response filed by Ms. Rebecca Keller on behalf of Anthony Keller Law Office [Docket No. 3852] (the "Keller Response") to the *Debtors' Third Omnibus Objection to Claims (Amended and Superseded Claims)* [Docket No. 3575] (the "Third Omnibus Claims Objection").¹

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Third Omnibus Claims Objection.

STATEMENT

1. By the Third Omnibus Claims Objection, the Debtors seek to expunge the Amended and Superseded Claim filed by claimant Anthony Keller Law Office (Claim No. 4962) as amended and superseded by the Surviving Claim filed by claimant Anthony Keller Law Office (Claim No. 5866). Ms. Keller filed the Keller Response on May 30, 2013.

2. Subsequent to the filing of the Keller Response, counsel to the Debtors and Ms. Keller conferred and discussed the purpose of the Third Omnibus Claims Objection with respect to the Amended and Superseded Claim (Claim No. 4962), and the issues set forth in the Keller Response. On June 5, 2013, Ms. Keller sent an email to Debtors' counsel confirming her understanding that the purpose of the Third Omnibus Claims Objection was to expunge the Amended and Superseded Claim (Claim No. 4962) and leave intact the Surviving Claim (Claim No. 5866). Counsel to the Debtors and Ms. Keller also confirmed by email communications that the Debtors reserve the right to object to the Surviving Claim on any basis, and Ms. Keller retains the right to respond or contest the Debtors' objection, if any, to the Surviving Claim.

3. Based on this communication, it is the Debtors' understanding that Ms. Keller agreed to withdraw the Keller Response to the extent it objects to the relief requested in the Third Omnibus Claims Objection.

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Dated: June 5, 2013
New York, New York

Respectfully submitted,

/s/ Norman S. Rosenbaum

Gary S. Lee

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